

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES RASO, TRUSTEE
of the MASSACHUSETTS BRICKLAYERS
AND MASONS HEALTH AND WELFARE,
PENSION AND ANNUITY FUNDS,

Plaintiff,

C. A. No. 03-12535-RCL

V.

STONWORKS BY RAND, RAND
STONWORKS

and

BOWDOIN CONSTRUCTION
CORPORATION

Defendants.

JOINT MOTION TO AMEND OF DISCOVERY SCHEDULE

Under the Joint Pre-Trial Schedule in the above action, the deadline for discovery is February 10, 2005 with Motions for Summary Judgment to be filed by March 10, 2005. In light of the recent change in counsel for Defendant Stoneworks by Rand and Rand Stoneworks, depositions previously scheduled were postponed. In order to allow new counsel sufficient time to review the file, additional time is required to reschedule depositions and explore a possible settlement of the matter. The parties therefore request that the discovery deadline be extended to April 10, 2005 with Motions for Summary Judgment to be filed by May 10, 2005.

For the Plaintiff,

CHARLES RASO, FUND MANAGER
of the MASSACHUSETTS BRICKLAYERS
AND MASONS HEALTH AND WELFARE
PENSION AND ANNUITY FUNDS

By his Attorney,

/s/ Catherine M. Campbell
Catherine M. Campbell
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Feinberg, Campbell & Zack, P.C.
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For the Defendants,

STONEWORKS BY RAND and
RAND STONEWORKS

By their Attorney,

/s/ Ralph N. Cecere
Ralph N. Cecere
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6 Eastman Place
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For Defendant,

BOWDOIN CONSTRUCTION
CORPORATION

/s/ Warren H. Brodie
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